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Invoice #: VELEZ01

Case: Velez v. Crown Holdings LLC

 Hourly Rate:
 \$295.00

 Billing Increments:
 1/10 Hour

 Date of Invoice:
 3/27/2012

Responsible Attorneys: Richard A. Voytas, Jr. (RAV), James W. Eason (JWE)

Date	Work Description	Hours Worked/Atty ID	Amount Billed
1/13/2012	Teleconference with Aida Velez to discuss two telephone calls from Day Knight Associates; discuss multiple potential FDCPA violations.	.8-RAV	\$236.00
1/13/2012	Conduct research on potential Defendant Day Knight Associates (actually Crown Holdings LLC) to determine size and solvency of Defendant; research prior consumer complaints and attempt to research prior litigation history (none available).	1.5-RAV	\$442.50
1/16/2012	Research recent decisions regarding disclosure of "principal balance" in accordance with FDCPA requirements; research recent decisions regarding whether threatened credit reporting within first thirty days violates FDCPA.	2.6 -JW E	\$767.00
1/16/2012	[NO CHARGE] Research recent decisions on supposed "consent" for autodialer contact placed with creditor and not bill collector.	.6 -JW E	NO CHARGE
1/17/2012	Review telephone recordings with Defendant and collection letter dated January 4, 2012 provided by Aida Velez.	.5-RAV	\$147.50
1/17/2012	Work on drafting FDCPA portion of Petition.	2.4-RAV	\$708.00
1/17/2012	[NO CHARGE] Work on drafting TCPA portion of Petition.	.6-RAV	NO CHARGE
1/18/2012	Prepare Motion for Appointment of Special Process Server and complete Civil Cover Sheet.	.5-RAV	\$147.50
2/20/2012	Receive telephone call from Bryan Brody regarding Defendant's assessment of this case as valueless, discuss Defendant's desire to try this matter to finality and to pursue fees against Aida Velez. Receive request to bring \$1,600 settlement figure to Aida Velez.	.4-RAV	\$118.00

2/21/2012	Review Defendant's removal paperwork to determine of Motion for Remand is feasible.	.5-RAV	\$147.50
2/21/2012	Telephone conference with Aida Velez to discuss Defendant's offer and desire to try the case, etc. Discuss potential implications of rejecting settlement and accepting settlement.	.5-RAV	\$147.50
2/21/2012	Prepare short email to Bryan Brody rejecting settlement.	.1-RAV	\$29.50
2/21/2012	Amend Petition to illuminate 15 USC 1692g"overshadowing" claim specifically; prepare Motion for Leave.	.8-RAV	\$236.00
2/27/2012	Begin drafting Affidavit of Aida Velez and conduct telephone conference with Aida Velez on the same.	.6-RAV	\$177.00
2/27/2012	Work on drafting Statement of Uncontroverted Facts.	2.0-RAV	\$590.00
3/1/2012	Finalize drafting of Aida Velez affidavit.	.5-RAV	\$147.50
3/1/2012	Work on researching overshadowing violation case law where the 1692g violation is a bi-fold threat of credit action and collection activity. Research credit threat as separate violation.	4.9-JWE	\$1445.50
3/1/2012	Draft Motion for Summary Judgment.	1.0-RAV	\$295.00
3/2/2012	Work on Memorandum in Support of Motion for Summary Judgment and Statement of Facts.	5.0-RAV	\$1475.00
3/3/2012	Finalize Motion, Memorandum, Statement of Facts and exhibits for filing.	1.2-RAV	\$354.00
3/5/2012	Receive telephone call from Aida Velez requesting status update; confirm Summary Judgment filed.	.2-RAV	\$59.00
3/6/2012	Review and analyze Defendant's Answer and Affirmative Defenses.	1.0-RAV	\$295.00
3/7/2012	Review Rule 16 Order from the Court.	.3-RAV	\$88.50
3/23/2012	Review Joint Scheduling Plan proposed by Defendant and briefly comment on same.	.5-JWE	\$147.50
3/26/2012	Receive and begin review of Response to Motion for Summary Judgment and Affidavit in support thereof; begin researching cases cited by Defendant to prepare Reply.	5.8-RAV	\$1711.00
3/27/2012	Work on drafting Reply brief. NO TIME BILLED AFTER RECEIPT OF OFFER OF JUDGMENT AT 3:32PM.	4.6-RAV	\$1357.00
3/27/2012	Receive and review Offer of Judgment. Conference with Aida Velez on the same.	.5-RAV	\$147.50
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